

AHMAD KESHAVARZ

Attorney at Law

16 COURT ST., SUITE 2600 WWW.NEWYORKCONSUMERATTORNEY.COM PHONE: (718) 522-7900
BROOKLYN, NY 11241-1026 E-mail: ahmad@NewYorkConsumerAttorney.com FAX: (877) 496-7809

October 3, 2014

Via ECF

Judge P. Kevin Castel
United State Courthouse
500 Pearl St.
New York, NY 10007

Re: Request to amend the deadlines in [DE 106].

Kulig v. Midland Funding, L.L.C. et al, Case 1:13-cv-04715-PKC

Dear Judge Castel:

Please accept this letter as a request to amend the deadlines set in this Court's Order, holding that "Kulig has failed to demonstrate that her counsel would serve as an adequate counsel in this case." [DE 106] at p. 12.

As an initial matter, Plaintiff seeks clarification as to what date the subsequent deadlines should flow from. [DE 106] states that it was filed on September 26, 2014. Counsel, however, received [DE 106] via ECF on September 29, 2014.

In addition, having conferred in person with Plaintiff Carol Kulig, counsel intends to file a motion for reconsideration of this Order on or before October 13, 2014 (14 days from September 29, 2014).¹ The Court's Order, however, sets October 20, 2014 as the deadline for Ms. Kulig to engage new counsel and for new counsel to request leave to renew the motion for class certification; in the alternative, October 27 is the deadline for her to proceed on an individual basis. Having to take either of these steps while the motion for reconsideration is pending would be unfair to Ms. Kulig.

Counsel therefore requests that this Court extend these deadlines so that they begin to run from the denial of Plaintiff's motion for reconsideration, in the event it is denied.

Sincerely,

/s/

Ahmad Keshavarz

¹ Among other things, the motion will establish that the \$20,000 individual offer of settlement about which this Court expressed grave concern was in fact promptly conveyed to Ms. Kulig by the undersigned. How the misimpression regarding this Offer came to be will be explained in detail.

Enclosures (as stated)

cc: all counsel of record via ECF